

The Organic Trade Association is extremely concerned about the FCC Telephone Consumer Protection Act in particular that removing the "established business relationship" qualification from the fax regulations is absolutely bad for business, forcing associations and other companies to obtain the written consent of their own members, clients and industry partners before transmitting any fax that could be interpreted as commercial in nature; and that the association community has already raised numerous concerns about the new regulations that remain a subject of speculation, including exactly which transmissions the FCC would interpret as commercial in nature, whether written consent to a national association would extend to chapter or affiliate faxes, and whether a written consent form would expire with membership, for example.

Please reconsider these rules to accomodate the normal and usual relationship that a trade association has with its members. Membership in a trade association is voluntary and there is a direct and indirect agreement between the trade association and its members that fax communications will be sent without prior notice or approval containing commercial availability of property, goods and services offered by the trade associations. Members can chose not to renew their membership in a trade association if they are not interested in the property, goods and services offered by the trade association. Members can also request that they receive no communications via fax from their trade association. Since a trade association is dependent on membership for its economic and political viability, it would be unwise for a trade association not to accomodate a member's request.

Thank you for your serious consideration of these comments.